UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

EPA United States Environmental Protection Agency Office of Pesticide Programs

MEMORANDUM

12/2/2019

SUBJECT: Product Chemistry Review for **Concrobium Mold Control** EPA Reg. No.: **82552-G**

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Registrant: Siamons International, Inc.
Action code: A540
Agency Due Date: 12/17/2019
DP No.: 454100
Submission No.: 1036690
E-Sub No.: 40557
Classification: EP
Process: Integrated system
Pesticide type: Antimicrobial

MRID(s):50821701, -02, -03, -04

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
073506	497-19-8	Sodium carbonate	1.0%
		Other Ingredients	99.0%
		Total	100%

I. BACKGROUND

The Registrant, Siamons International, Inc., has submitted an application for pesticide registration for their product: Concrobium Mold Control EPA Reg. No. 82552-G. This end use product is formulated as a mildewstat and fungistat for household and commercial use sites.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator's Exemption Statement	☐	☒
EPA FORM 8570-35 – Data Matrix (6/26/2019)	☒	☐
Cover letter (6/26/2019)	☒	☐
Transmittal document	☒	☐
Proposed CSF BASIC, (6/26/2019)	☒	☐
Proposed label, (5/26/2019)	☒	☐
Certification for Pilot Fragrance Notification Program	☐	☒
	☐	☐

III. FINDINGS

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	☐	☐	☐	☐	☒
Integrated	☐	☐	☒		

Active Ingredients(s)	Nominal	Upper limit	Lower limit
Sodium carbonate	1.00%	1.05%	0.95%

	YES	NO	N/A
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	☐	☒	☐
2. Wider certified limits were requested and rationale was accepted.	☒	☐	☐
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	☒	☐	☐

4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	☒	☐	☐
5. All inert ingredients are approved for non-food use pesticide formulations.	☒	☐	☐
6. The impurities present >0.1% are identified.	☐	☒	☐
7. Impurities of toxicological significance have an upper certified limit.	☐	☐	☒

b. Product Label:

	Yes	**NO**	**N/A**
The formula contains one of the following:			
1. 10% or more of petroleum distillate	☐	☒	☐
2. 1.0% or more of methyl alcohol	☐	☒	☐
3. Sodium nitrite at any level	☐	☒	☐
4. A toxic list 1 inert at any level	☐	☒	☐
5. Arsenic in any form	☐	☒	☐
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	☐	☐	☒
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	☒	☐	☐
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	☒	☐	☐
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	☐	☐	☒

IV. Additional Findings

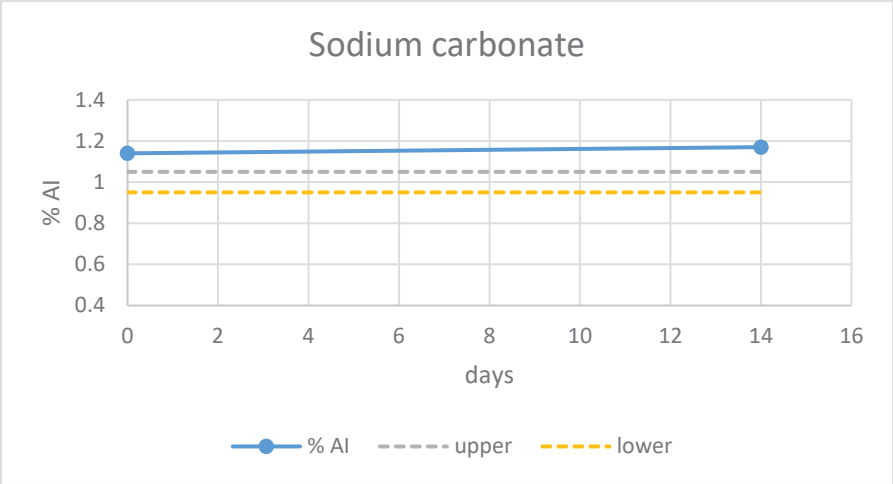
1. Wider certified limits for an inert ingredient are acceptable.

2. A preliminary analysis of the technical grade active ingredient and all impurities greater than 0.1% present was not submitted. This is required for products produced by an integrated system and needed for all sources of the unregistered active ingredient.

3. A description of the production process containing information on how the active ingredient is produced was address in MRID 50821701, however, the description is lacking the details as outlined in 40 CFR 158.330 (b).

4. The results of the accelerated storage stability are reported in Figure A. The concentration of the test substance used in the study was above the upper certified limit. The study is not acceptable.

Figure A



V. Conclusion

The Series 830 Guidelines have not been fulfilled to support the registration of 82552-G. Guidelines 830.1620 (Description of production process), 830.1670 (Discussion of formation of impurities), and 830.1700 (Preliminary analysis) all require upgrading. Additionally, the basic CSF (6/26/2019) is not acceptable due to the unresolved data requirements. Guideline 830.6317 (Storage stability) is not acceptable and PSB recommends a 12-month storage stability be submitted. The other Group B data requirements are acceptable.

VI. Table A:

Series 830 guidelines – Group A

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50821701
830.1600	Description of materials	Acceptable	50821701
830.1620	Description of production process	Requires upgrading	50821701
830.1650	Description of formulation process	Acceptable	50821702
830.1670	Discussion of formation of impurities	Requires upgrading	50821701
830.1700	Preliminary analysis	Requires upgrading	50821702
830.1750	Certified limits	Acceptable	50821701
830.1800	Enforcement analytical method	Acceptable	50120802
830.1900	Submittal of samples	Acceptable	50821701

VII. Table B: Series 830 guidelines – Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Lovibond color #1	Acceptable	50821703
830.6303	Physical state	liquid	Acceptable	50821703
830.6304	Odor	aromatic	Acceptable	50821703
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGAI	Not applicable	N/A
830.6314	Oxidation/Reduction	The product was not compatible with Potassium permanganate.	Acceptable	50821703
830.6315	Flammability	Product is not potentially flammable; >200 ^{o}F	Acceptable	50821703
830.6316	Explodability	Product does not contain explosive ingredients	Acceptable	50821701
830.6317	Storage stability	An accelerated storage stability test was conducted; however, the test substance was not within the certified limits.	Not acceptable	50821704
830.6319	Miscibility	Product not mixed with organic solvents	Acceptable	50821701
830.6320	Corrosion characteristics	No evidence of corrosion or phase separation.	Acceptable	50821704
830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Acceptable	50821701
830.7000	pH	11.24	Acceptable	50821703
830.7050	UV/Visible absorption	Not required for MUP or EP	Not applicable	N/A
830.7100	Viscosity	1.075 cSt	Acceptable	50821703
830.7200	Melting point	Not required for MUP or EP	Not applicable	N/A
830.7220	Boiling point	Not required for MUP or EP	Not applicable	N/A
830.7300	Density/relative	1.0231 g/mL	Acceptable	50821703
830.7370	Dissociation constants in water	Not required for MUP or EP	Not applicable	N/A
830.7520	Particle size	Not required for MUP or EP	Not applicable	N/A

830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Not applicable	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP	Not applicable	N/A
830.7950	Vapor pressure	Not required for MUP or EP	Not applicable	N/A